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Jacqueline Bryant
Clark of the Court
Transaction # 7901252 :yuloria

1 **COMP**
 2 **CONNELL LAW**
 3 Christopher S. Connell, Esq.
 Nevada Bar No. 12720
 4 6671 Las Vegas Blvd., Suite 210
 Las Vegas, NV 89119
 (702) 266-6355; Fax: (702) 829-5930
 5 cconnell@connellnlawlv.com
 6 Attorneys for Tamarina Cournoyer

7 **DISTRICT COURT**

8 **WASHOE COUNTY, NEVADA**

9 TAMARINA COURNOYER, individually,	Case No.:
10 Plaintiff,	Dept. No.
11 vs.	COMPLAINT
12 TARGET CORPORATION d/b/a TARGET	
13 #2472; DOES I-X and ROE	
14 CORPORATIONS I-X, inclusive,	
15 Defendants.	

16 Plaintiff TAMARINA COURNOYER, by and through her attorney of record,
 17 CHRISTOPHER S. CONNELL, ESQ. of the law firm CONNELL LAW, complains against
 18 Defendant TARGET CORPORATION d/b/a TARGET #2472 (hereinafter the "Defendant") as
 19 follows:

20 **PARTIES**

21

22 1. That Plaintiff TAMARINA COURNOYER (hereinafter "Plaintiff") is and, at all times
 23 mentioned herein, was a resident of the County of Clark, State of Nevada.

24 2. The Defendant, TARGET CORPORATION d/b/a TARGET #2472 owned and operated
 25 that certain business by virtue of the laws of the State of Nevada and at the time of the
 26 incident in question was the property owner of the premises located at 1550 E. Lincoln
 27 Way, Sparks in the County of Washoe, State of Nevada.

28

- 1 3. That the true names and capacities of the Defendants designated herein as DOES I-X and/or
2 ROE CORPORATIONS I-X are presently unknown to Plaintiff at this time, who therefore
3 sues said Defendants by such fictitious names. When the true names and capacities of these
4 Defendants are ascertained, Plaintiff will amend this Complaint accordingly.
- 5 4. That at all times pertinent, Defendants were agents, servants, employees, or joint venturers
6 of every other Defendant herein and, at all times mentioned herein, were acting within the
7 scope and course of said agency, employment, or joint venture with knowledge, permission
8 and consent of all other named Defendants.

JURISDICTION

11 5. All of the acts giving rise to the instant action occurred in the State of Nevada, County of
12 Washoe.
13
14 6. The amount in controversy, represented by actual damages caused to Plaintiff, exceeds
15 \$15,000.

GENERAL STATEMENT OF FACTS

18 7. On or about June 13, 2018, Plaintiff TAMARINA COURNOYER, was a guest and/or
19 business invitee on the premises of Defendants when she slipped and fell as a result of a
20 foreign debris or substance on the floor of the premises.
21
22 8. It was the duty of Defendants and each of them, to use ordinary due care and diligence to keep
23 and maintain the premises in a condition reasonably safe for its intended guests and business
24 invitees and to keep said premises free from all conditions which would render it dangerous
25 and unsafe for Plaintiff or present an unreasonable risk of harm to her in her lawful use of the
26 same.

- 1 9. It was the duty of Defendants and each of them, to exercise reasonable care to protect Plaintiff
2 from the danger of reasonably foreseeable injury occurring from her reasonable foreseeable
3 use of the premises.
- 4 10. It was the duty of the aforesaid Defendants, and each of them, to have available sufficient
5 numbers of personnel and equipment, sufficiently trained to properly inspect and maintain the
6 aforesaid premises in a condition reasonably safe for Plaintiff and free from debris and any
7 foreign substance and conditions rendering it unsafe.
- 8 11. It was the duty of the aforesaid Defendants, and each of them, to warn Plaintiff of the
9 dangerous and unsafe conditions rendering it unsafe.
- 10 12. The fall and resulting injuries of Plaintiff were proximately caused by the negligence of
11 Defendants, and each of them.
- 12 13. Defendant breached its duties of reasonable and ordinary care to Plaintiff and to others.
- 13 14. Defendant was directly responsible for each and every act of said agents, servants and/or
14 employees, who were acting within the course and scope of their employment and for the
15 benefit of TARGET CORPORATION d/b/a/ TARGET #2472.

FIRST CAUSE OF ACTION

(Negligence):

- 21 15. Plaintiff incorporates paragraphs 1 through 14 of the Complaint as though said paragraphs
22 were fully set forth herein.
- 23 16. Defendants owed Plaintiff a duty of care to warn Plaintiff of the non-obvious Dangerous
24 Condition.
- 25 17. Defendants breached this duty of care by failing to place adequate caution signs, or
26 otherwise failing to warn Plaintiffs of the dangerous, non-obvious condition.

1 18. Defendants' negligence directly and proximately caused Plaintiffs serious injury

2 19. As a direct and proximate result of Defendants' negligence, Plaintiff received medical and

3 other treatments for injuries sustained to body, limbs, organs and nervous systems, all or

4 some of which conditions may be permanent and disabling and, all to Plaintiffs' damage in

5 a sum in excess of \$15,000.

6 20. That said medical treatment is continuing and is likely to continue in the future.

7 21. Upon information or good faith belief, Defendants did not provide adequate training for its

8 employees.

9 22. Upon information or good faith belief, Defendants hired persons who were not sufficiently

10 trained to ensure patrons safety.

11 23. Upon information or good faith belief, many patrons have been injured due to similar

12 circumstances.

13 24. Upon information or good faith belief, spills of liquids on the floor occur on a frequent

14 basis at this Property.

15 25. Upon information or good faith belief, Defendants were on notice of frequent spills of

16 liquids in the locale where the incident occurred.

17 26. As a direct and proximate result of Defendants' negligence, Plaintiffs have been required

18 to and has limited certain occupational and recreational activities, which has caused, and

19 is likely to continue to cause loss of earning capacity, lost wages, and loss of enjoyment of

20 life.

21 27. Plaintiffs have been required to engage the services of an attorney, incurring attorney's fees

22 and costs to bring this action.

23 28 ///

PRAYER FOR RELIEF

WHEREFORE, Plaintiff TAMARINA COURNOYER, expressly reserving the right to amend this complaint prior to or at the time of trial of this action to insert those items of damage not yet fully ascertainable, prays for judgment against all Defendants, and each of them, as follows:

1. For general damages sustained by Plaintiff in an amount in excess of \$15,000.00;
2. For special damages sustained by Plaintiff in an amount in excess of \$15,000.00;
3. For reasonable attorney's fees and costs;
4. For interest at the statutory rate; and
5. For such other relief as the Court deems just and proper.

DATED this 1st day of June 2020.

Christopher S. Connell
CONNELL LAW
Christopher S. Connell, Esq.
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6671 Las Vegas Blvd., Suite 210
Las Vegas, NV 89119
(702) 266-6355; Fax: (702) 829-5930
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